

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHEVRON CORPORATION,	:
	:
Plaintiff,	:
	:
-against-	:
	:
STEVEN R. DONZIGER, et al.,	:
	:
Defendants.	:
	:
----- X	

Case No. 11 Civ. 0691 (LAK)

**DECLARATION OF JASON B. STAVERS IN SUPPORT OF CHEVRON  
CORPORATION’S POST-TRIAL MEMORANDUM OF LAW**

I, JASON B. STAVERS, hereby declare under penalty of perjury pursuant to 28 U.S.C.  
§ 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of Colorado and admitted to practice before this Court pro hac vice. I am an attorney at the law firm of Gibson, Dunn & Crutcher LLP and counsel of record for Chevron Corporation (“Chevron”) in the above-captioned matter. I am personally familiar with the facts set forth herein, unless the context indicates otherwise.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the transcript of the deposition of Douglas Beltman, taken on October 22, 2013 in *Republic of Ecuador v. Stratus Consulting, Inc.*, No. 13-cv-01112-REB-KLM (D. Colo).

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the transcript of the deposition of Ann Maest, taken on November 6, 2013 in *Republic of Ecuador v. Stratus*

*Consulting, Inc.*, No. 13-cv-01112-REB-KLM (D. Colo).

4. Attached hereto as Exhibit C is a true and correct copy of the decision of the Court of Appeal for Ontario in *Yaiguaje v. Chevron Corp.*, 2013 ONCA 758 (Dec. 17, 2013).

5. Attached hereto as Exhibit D is a true and correct copy of an excerpt from W. Page Keeton et al., *Prosser and Keeton on Torts* § 105 (5th ed. 1984).

6. Attached hereto as Exhibit E is a copy of the witness statement of Steven Donziger (DX 1750), with testimony stricken by the Court (Dkt. 1742 at 1–2) crossed out and testimony that the Court admitted but not for the truth of matters asserted (*id.*) highlighted in gray. The Court’s order regarding Mr. Donziger’s testimony is appended to the end of the statement. Exhibit E is otherwise a true and correct copy of Mr. Donziger’s witness statement.

7. Attached hereto as Exhibit F is a copy of the witness statement of Karen Hinton (DX 1500), with testimony stricken by the Court (Dkt. 1713 crossed out and testimony that will be considered only for Donziger’s “state of mind” (*id.*) highlighted in gray. The Court’s order regarding Ms. Hinton’s testimony is appended to the end of the statement. Exhibit F is otherwise a true and correct copy of Ms. Hinton’s witness statement.

8. Attached hereto as Exhibit G is a copy of the witness statement of Alejandro Ponce-Villacis (DX 1601), with testimony stricken by the Court (Tr. (Ponce) 2221:5–10) crossed out. An excerpt from the trial transcript, discussing Mr. Ponce’s statement, is appended to the end of the statement. Exhibit G is otherwise a true and correct copy of Mr. Ponce’s witness statement.

9. Attached hereto as Exhibit H is a copy of the witness statement of Sara McMillen (PX 3300), with testimony withdrawn by Chevron crossed out. Exhibit H is otherwise a true and correct copy of the witness statement of Sara McMillen.

10. Attached hereto as Exhibit I is a true and correct copy of the DOJ Information in

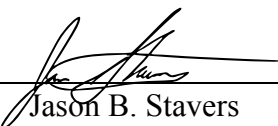
*United States v. Pride Forasol S.A.S.*, No. 4:10-cr-771 (S.D. Tex. Nov. 4, 2010), which is not available on Westlaw.

11. Attached hereto as Exhibit J is a true and correct copy of the DOJ Plea Agreement in *United States v. Brown*, No. H-06-cr-316 (S.D. Tex. Sept. 14, 2006), which is not available on Westlaw.

12. Attached hereto as Exhibit K is a true and correct copy of *SEC v. Montedison, S.p.A.*, Civil Action No. 1:96-cv-02631, SEC Litigation Release No. 16948 (D.D.C. Mar. 30, 2001), which is not available on Westlaw.

13. Attached hereto as Exhibit L is a true and correct copy of FCPA Opinion Procedure Release No. 07-03 (Dec. 21, 2007), which is not available on Westlaw.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 23, 2013 at Denver, Colorado.

  
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Jason B. Stavers